

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

CHUBB NATIONAL INSURANCE
COMPANY and TRAVELERS PERSONAL
SECURITY INSURANCE COMPANY,

Plaintiffs,

vs.

DALE & MAXEY, INC. d/b/a DALE
INCORPORATED, and HERBERT ALLEN
COLE d/b/a WILLIAMSON COUNTY
HEATING AND PLUMBING,

Defendants.

CIVIL ACTION NO.: 3:13-CV-0528

JOINT MOTION TO EXTEND CURRENT DEADLINES

OKUP SK
This motion is
GRANTED and the
dates on pp 4-5 of
This motion
are ADAPTED.

COME NOW, the plaintiffs, Chubb National Insurance Company (Chubb) and Travelers Personal Security Insurance Company (Travelers), defendant, Dale & Maxey, Inc. d/b/a Dale Incorporated (Dale, Inc.) and defendant Herbert Allen Cole d/b/a Williamson County Heating and Plumbing (Cole), by and through the undersigned counsel, and for good cause shown hereby move the Court for entry of an Order that extends the deadlines for expert disclosures of defendants, discovery, mediation, and Daubert and dispositive motions, and as grounds states:

1. This case involves property damages from a fire of October 21, 2011 to the home and vehicle of George Thomas (Tom) Vogel and Denise Vogel at 17 Oxmoor Court, Brentwood, TN 37027, who were insured with Plaintiffs, Chubb National Insurance Company and Travelers, which have brought this action in subrogation to the Vogel's rights.

2. The theory of the case surrounds work done at and near a fireplace that allegedly caused a fire in the fireplace to extend beyond the fireplace and destroy the Vogels' home.